

## Gas Processors Association

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June 20, 2000

Gere Glover, Chief Counsel
Office of Advocacy
U.S. Small Business Administration
409 3<sup>rd</sup> Street, SW - Suite 7800
Washington, DC 20416

RE:

Assistance of SBA Office of Advocacy

Dear Gere:

As you know, the Gas Processors Association ("GPA") is a trade association representing 93% of the gas liquids production in the U.S. The majority of our members are small businesses that depend upon equitable treatment for small businesses as provided by federal law. In spite of these protections, federal agencies sometimes tend to overlook the disadvantages in the marketplace faced by small business when implementing federal law. Your Office of Advocacy has been invaluable over the years in assisting GPA to bring small business concerns to federal agencies.

Most recently, the Office of Advocacy coordinated efforts of small businesses with respect to the Environmental Protection Agency's ("EPA") proposed revisions to the Inventory Update Report ("IUR") rule under the Toxic Substances Control Act ("TSCA"). Under the TSCA IUR, GPA members must report data to EPA for natural gas streams processed at their facilities. This reporting duplicates reporting to other federal agencies and therefore unnecessarily burdens companies.

Through the work of your office, GPA's concerns and documents supporting its position were provided to EPA during the drafting of the proposed rule. SBA was instrumental in ensuring that EPA recognized the burdensome and duplicative nature of the TSCA IUR requirements. Ultimately, EPA proposed a rule that moves toward minimizing these burdens.

GPA commends the Office of Advocacy for its consistently professional, dedicated efforts on behalf of small business. Your staff has been fundamental to timely intervention in rulemaking

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proceedings of various federal agencies to ensure equitable interpretation of laws as they apply to small business. GPA looks forward to continued collaboration with your office in future rulemakings.

If you have questions or need additional information, please contact me at 918/493-3872.

Sincerely yours,

Johnny Dreyer

Director of Industry Affairs